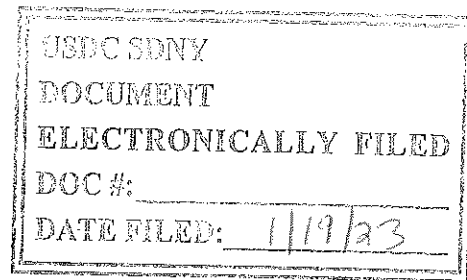


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January 18, 2023

BY ECF

The Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: United States v. Ephraim Ullman, 22 Cr. 00003 (RMB)

Dear Judge Berman:

On January 10, 2023, I filed a Notice of Appearance in this case and the same day sought an adjournment of the sentence date from February 7, 2023, to March 9, 2023. In that letter I also promised to provide the Probation Department with materials and objections necessary to complete the Presentence Investigation Report by the close of last week. I kept my promise and provided all that material to the Probation Department on January 13, 2023. The Court denied my application on January 12, 2023.

At the time of my letter, I did not realize that the Probation Department had already submitted the final Presentence Investigation Report without receiving the defendant's tax and financial information, medical records and objections. As such, I now renew my motion to adjourn the sentence until March 9, 2023, so that the Court will have the benefit of a complete Probation Report. As it now stands, the Report is incomplete inasmuch as it makes reference to there being no objections and to the absence of important documents that recently retained counsel promptly provided to

The Honorable Richard M. Berman

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the Probation Department. The defendant should not be sentenced by the Court without a complete Probation Report, through no fault of his own.

Thank you for considering it this application.

Respectfully submitted,

/s/ Alexei Schacht

Alexei Schacht

cc: United States Attorney
Steven Metcalf, Esq.
United States Department of Probation

Sentencing is adjourned to 2/14/23
at 11:00am. Defense submission
is due 1/30/23. Government
submission is due 2/6/23. If
counsel is not prepared to conduct
a sentencing on that date, the date
will be converted into a hearing
on counsel's unusual inability to
SO ORDERED:
Date: 1/19/23 Richard M. Berman
Richard M. Berman, U.S.D.J.
meet typical criminal case milestones.